Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

Applicant: Food Safety, S.A.

Program: NOP/Accreditation for Organic Certification Organizations- On-site Audit

Location(s): Buenos Aires, AR

Audit Date(s): February 28 – March 4, 2005

Audit File Number: NP5061EEA

Action Required: Yes

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AUDIT ACTIVITIES

On February 28-March 4, 2005, representatives of the USDA, AMS, LS, Audit, Review, and Compliance (ARC) Branch conducted an on-site audit of the Food Safety, SA Organic Certification Program located in Buenos Aires, AR. The objective of the audit was to assess compliance of the Food Safety certification activities to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). All Argentine export certification services are governed by SENASA, the Argentine Agricultural Ministry, and all internal movement of products, along with those products destined for export are controlled by this ministry. Food Safety is also accredited by IFOAM, JAS (through an agreement with Quality Assurance International - QAI), BIOSUISSE, the EU 2092/91 Rule, and livestock (beef) according to Chilean Standards.

The scope of the audit included an evaluation of the certification procedures, decisions, facilities, and the administrative and management system at Food Safety. Organic grains certified for export in accordance with the NOP Standard were verified through observations and interviews of the Food Safety certification activities at Lauquén (Don Alejo S.A.), and Ingal, S.A. The opening and closing meetings were conducted with President Dr. Roberto Rapela, Director of Administration and Marketing Lilian C. Camou, and Technical Director Maria Susana Vidal. The audit plan, audit estimate, travel arrangements made by the certifying agent, and the responses to previous non-conformances were discussed during the opening meeting.

On March 3, 2005 an organic production onsite observation was performed at Lauquén "Don Alejo S.A." This "campo" is a large Patagonian organic farming operation owned by Raul Enrique Haure and is located near Villalonga. Eighteen crop fields, buffers, grain storage, machinery, and additional records used to verify organic production at Lauquén were evaluated for completeness and compliance to the NOP Standard. Production records, seed purchases, and records of grain inventories and movement following harvest were reviewed at the home office of Raul Haure in Villalonga. This site visit did not include a Food Safety inspection.

On March 4, 2005 a certification inspection was performed at Ingal, S.A., a grain processor and handler in Los Cardales. The inspection was the first renewal for NOP certification at Ingal S.A., and was performed by contract inspector, Alfredo Padilla 44379. This facility handles and cleans only certified organic grain. Records indicate that three other certifiers in Argentina use Ingal as a resource for handling and processing certified grain. Ingal S.A. was the subject of a previous NOP inspection during

the LETIS, S.A. onsite audit. All grains at this location certified to the NOP Standard are loaded into containers for export. Silos 4 and 7 are identified for use specifically for NOP. Ingal does not bag any grains certified under NOP.

FINDINGS

Records and procedures reviewed, observations made, and interviews conducted indicate that Food Safety S.A. is currently operating under the guidelines of the NOP Rule except as noted in the Findings section of this report. One minor non-compliance was identified during the audit. There were no outstanding non-compliances from the accreditation audit to review.

Non-compliance

NP5061EEA.NC1 - Minor – 205.405 states, "...the notification of non-compliance shall provide: (1) a description of each non-compliance, (2) the facts upon which the notification of non-compliance is based, and (3) the date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible. A noncompliance was identified on during the on-site inspection of El Cuadro del Vasco. The non-compliance was issued because there was no evidence that equipment cleaning logs were being maintained. A Notice of Noncompliance was issued by Food Safety on January 03, 2005. The notice did not contain the date by which the producer must respond to the noncompliance. No response had been recorded as of the final day of this audit.